

### Overview of Federal Program Monitoring

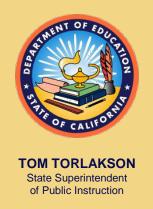
### For Local Educational Agency Review Coordinators

Federal Program Monitoring Office

August 2014

CALIFORNIA DEPARTMENT OF EDUCATION

Tom Torlakson, State Superintendent of Public Instruction



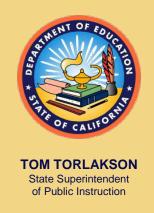
### **Objectives**

- Prepare local educational agency (LEAs) for a successful Federal Program Monitoring (FPM) review
- Review essential roles and responsibilities of the LEA Review Coordinator and Regional Team Leader
- Review changes this year to the FPM review process



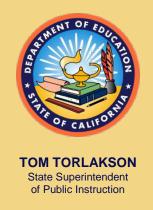
### **Agenda**

- 2014–15 Changes
- 2014–15 Participating Programs
- Roles and Responsibilities of LEA Review Coordinator and Regional Team Leader
- Compliance Monitoring Web page



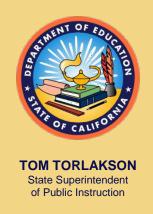
### Agenda (Cont.)

- Sample Schedules for On-site and Online Reviews
- Notification of Findings
- Examples of Recent Findings
- Organizing for a Successful FPM



### Agenda (Cont.)

- From the Field: Presentation by LEA Coordinator from 2013–14 FPM Cycle
- 2013–14 Frequent Findings
- Questions
- Additional Resources and Contact Information



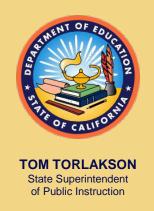
### **2014–15 Changes**

- Additional programs
- Program instrument changes
- Clarification of allowable expenditures



# 2014–15 Participating Programs

- Adult Education
- Before and After School Programs
- Career Tech Education
- Compensatory Education
- Early Education Services
- Education Equity
- English Learner



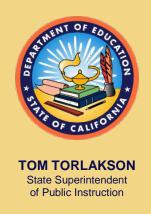
# 2014–15 Participating Programs (Cont.)

- Fiscal Monitoring
- Homeless Education
- Improving Teacher Quality
- Migrant Education
- Neglected or Delinquent
- Physical Education
- Uniform Complaint Procedures



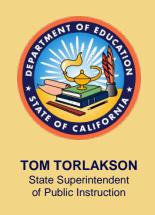
# Key Roles in the FPM Process

- LEA Review Coordinator: The person assigned to coordinate the review, and the primary contact between the LEA and CDE.
- Regional Team Leader (RTL):
   The CDE staff person responsible for planning, scheduling, coordinating and monitoring the progress of the review.



## Role of LEA Review Coordinator

- Monitors progress of the FPM on the LEA side
- Ensures effective communication between LEA staff and CDE staff
- Meets with FPM team to debrief daily
- Ensures prompt follow-up to reviewer comments



# Role of the Regional Team Leader

- Monitors and facilitates the FPM process
- Ensures FPM review is conducted consistently with FPM policies and procedures
- Promotes transparency—a policy of "no surprises"

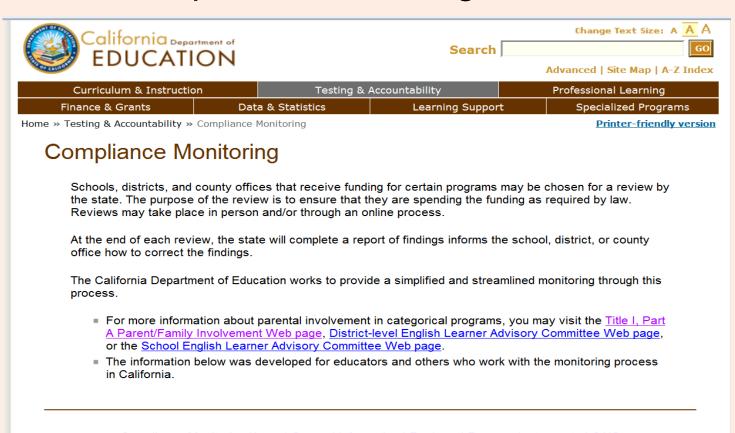


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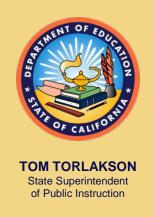
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# Compliance Monitoring Web Page

http://www.cde.ca.gov/ta/cr/

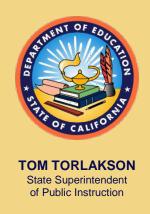


Compliance Monitoring Home | General Information | Reviews | Program Instruments | CAIS |
Correspondence | Contact Information | Additional Federal and State Monitoring

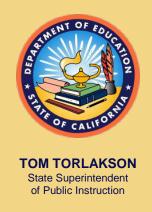


# Compliance Monitoring Web Page (Cont.)

- 2014–15 Program Instruments (Coming Soon)
- CAIS link and CAIS County Leads
- Resolution Process
- FPM Review Schedule
- FPM Training Resources



# Sample Daily Schedule for On-Site Review



### **District Level Review**

- Begins with District Entrance Meeting
- Continues the review of documentation of district-level items
- Usually involves a review of district policies and procedures, and district-level expenditures



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XXXXXXXX School District **Federal Program Monitoring Review On-site Daily Schedule** 

Date:

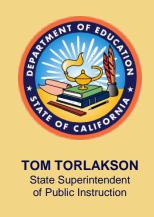
**District Office: Address and Phone Number** 

**LEA Review Coordinator:** 

Participating Programs: BASP, CD, CE, EL, ME, PE, UCP (online)

Time	Activity	Location/Personnel/ Other Instructions				
12:30 p.m.	Preliminary FPM Team Meeting  On-site team meeting	District Office      CDE team members				
1 p.m.	<ul> <li>District Entrance Meeting</li> <li>CDE and LEA introductions</li> <li>RTL opening comments</li> <li>Brief LEA comments ( e.g., demographics, performance profiles, district challenges, other salient information)</li> <li>Finalize or adjust the schedule and logistics</li> </ul>	District Office  CDE team members  Selected LEA staff				
1:30 p.m.	<ul> <li>District Review</li> <li>Interviews with district program personnel</li> <li>Interview designated advisory committee members</li> </ul>	District Office  CDE team members  LEA program administrators				
4:30 p.m.	Debriefing  CDE team members will debrief individually with LEA program counterparts	District Office				

Team may need technical assistance to access the internet.



### **Site Visit**

Review of documents submitted in CAIS

 Review of confidential student data and other data as necessary

Observations and interviews



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State Superintendent of Public Instruction

### XXXXXXXX School District On-site Daily Schedule

Date:

School Site Name, Address and Phone Number
Participating Programs: CE, EL, ME, BASP\*, PE, UCP (online)

Time	Activity	Location/Personnel/ Other Instructions
8:30 a.m.	<ul> <li>Site Entrance Meeting</li> <li>Introductions</li> <li>Brief school comments (e.g., demographics, performance profiles, other salient information)</li> <li>Schedule and logistics</li> </ul>	School Site      CDE team members     Principal and selected staff     LEA Review Coordinator and program staff
9 a.m.	<ul> <li>Interviews (30 minutes per group) with program staff</li> <li>9 a.m. – Certificated staff funded with categorical funds</li> <li>9:30 a.m. – Classified staff funded with categorical funds</li> <li>Observation of instructional settings</li> <li>Review student confidential records</li> </ul>	School Site  CDE team members  **Personnel funded through programs being reviewed Teachers Paraprofessionals Other staff paid with categorical funds
	Lunch (may be working lunch with	team)



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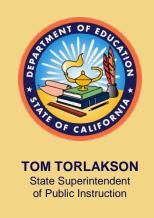
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#### School site visit (Cont.)

1 p.m.	<ul> <li>Interview council and committee members, as applicable:</li> <li>1 p.m. School Site Council Members</li> <li>1:30 p.m. Advisory Committee Members</li> <li>Note: These meetings should be scheduled at a time when teachers, staff, and parents on SSC can attend.</li> </ul>	School Site  CDE team members  SSC meetings must not include students						
2 p.m.	Complete interviews, observations, and review of student records	School Site  CDE team members						
3 p.m.	CDE Team Debriefing Meeting	School Site     CDE team members						
3:30 p.m.	School Site Debriefing  CDE team members report on findings with principal and district/school leadership	School Site						
5 p.m. (Day before Exit Meeting)	Final Deadline for uploading documents in CAIS	LEA Review Coordinator						
8 p.m. (Day before Exit Meeting)	Deadline for Program Reviewers to complete writing of preliminary findings in CAIS	CDE team members						

Notes: Team may need assistance with access to the internet.

- \* BASP team member may enter 90 minutes before regular classes begin if site has a before school program and between the end of the regular day and 6 p.m. for after school programs.
- \*\* Staff funded in whole or in part from categorical funds for programs being reviewed at site.



# District Exit: Presentation of Findings

LEA given opportunity to review preliminary findings

 LEA may request a District Meeting to provide clarification

NOF is presented at Exit Meeting



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#### XXXXXXXX School District Federal Program Monitoring Review On-site Daily Schedule

Date:

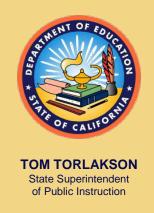
**District Office: Address and Phone Number** 

Time	Activity	Location/Personnel/ Other Instructions				
8:30 a.m.	CDE Team Meeting  • Finalize preliminary findings	District Office      CDE team members				
10 a.m.	The CDE team meets with LEA personnel to respond to clarifying questions or concerns with preliminary findings	District Office  CDE team members  Selected LEA staff				
10:30 a.m.	<ul> <li>Exit Meeting</li> <li>NOF</li> <li>Discuss resolution process</li> </ul>	District Office  • RTL				

Notes:

Preliminary Findings will be presented to the LEA by 9 a.m.

RTL will need access to a printer and copier for the Notification of Findings.



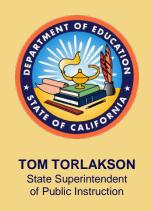
### **Online Reviews**

- Some programs test only a subset of program instrument items during the on-line review-not the full instrument
- Conducted entirely through CAIS
- No interviews or observations
- Results depend solely upon LEA documentation



### **Online Reviews (Cont.)**

- All exchanges must be documented in CAIS
- Review includes daily debriefings of the status of each instrument in CAIS
- On the day of the exit, LEA has the opportunity to request a conference call to clarify findings



### Day 1: Entrance

- No formal entrance
- District and selected sites are reviewed each day



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#### XXXXXXXX School District Federal Program Monitoring Review Online Daily Schedule

**LEA Review Coordinator and Contact Number:** Regional Team Leader and Contact Number

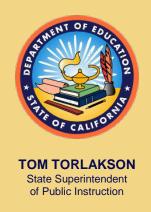
Participating Programs: BASP, CD, CE, EL, ME, PE, UCP

#### DAY 1: Entrance

Time	Activity	Personnel
9 a.m.	The LEA Review Coordinator is notified that the FPM review is in progress.	Regional Team Leader
Throughout the day	Interaction in CAIS continues between program reviewers and the LEA program counterparts.	<ul> <li>Program Reviewers</li> <li>Selected LEA program counterparts</li> </ul>
4 p.m.	Program reviewers debrief with LEA program counterparts by posting a CAIS comment regarding any program instrument item not meeting legal requirements as of today.	Program Reviewers

#### Notes:

The LEA can continue to upload additional documents until 1 p.m. on the day before the exit.



# **Exit:**Presentation of Findings



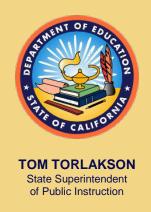
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State Superintendent of Public Instruction

### XXXXXXX School District Federal Program Monitoring Review LEA Review Coordinator and Contact Number Regional Team Leader and Contact Number

#### (Date) EXIT

Time	Activity	Personnel
9 a.m.	Deadline for RTL to send the Preliminary Findings to the LEA	Regional Team Leader
10 a.m.	Deadline for LEA to request a conference call to clarify Preliminary Findings	<ul> <li>Regional Team Leader</li> <li>LEA Review Coordinator</li> </ul>
11 a.m.	Conference call with LEA (scheduled upon request by the LEA).	<ul> <li>Regional Team Leader</li> <li>Select Program Reviewers</li> <li>Select LEA program counterparts</li> </ul>
noon	Final NOF distributed to the LEA and uploaded into CAIS	<ul> <li>Regional Team Leader</li> <li>FPM Office Staff</li> </ul>
1 p.m.	RTL contacts the LEA to discuss the resolution of findings process	Regional Team Leader



# Notification of Findings (NOF)

LEA Name:

California Department of Education

#### Federal Program Monitoring Notification of Findings

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County:	Review Dates: 12/05/2011 - 12/09/2011						
FPM Region: Region 08							
FPM Coordinator: Diane Wallace	Telephone:	E-mail: wallaced@bcsd.com					
Regional Team Leader: Ted Hawthorne	Telephone: 916-319-0321	E-mail: thawthorne@cde.ca.gov					

Program Reviewed	Program Reviewer
Physical Education-Cycle B (PE)	Bob Calvo Doug Jann
Uniform Complaint Procedures-Cycle B (UCP)	Shanine Coats Sally Lewis Arturo Vasquez
State Fiscal Stabilization Fund-Cycle B (SFSF)	Paula Flores Oluwole Olukoya
Child Development-Cycle B (CD)	Mitzi Inouye Sandy Patitucci
Before and After School Programs - Cycle B (BASP)	Corlene Goi
Fiscal Monitoring-Cycle B (FM)	Paula Flores Oluwole Olukoya
English Learner-Cycle B (EL)	Sonia Petrozello
Education Jobs Fund - Cycle B (EJF)	Paula Flores Oluwole Olukoya
Improving Teacher Quality-Cycle B (ITQ)	Geeta Rezvani
Compensatory Education-Cycle B (CE)	Keith Coppage
Migrant Education-Cycle B (ME)	Frank Uribe

This is the official Notification of Findings (NOF) report of the review visit conducted by the California Department of Education (CDE). Because the methodology of the review involves sampling, it is not an assessment of all legal requirements. Nevertheless, the local educational agency (LEA) is responsible for operating its federal categorical programs in compliance with all applicable laws and regulations.

The LEA is required to resolve each Federal Program Monitoring (FPM) finding within 45 calendar days which ends on 01/23/2012. When a FPM finding cannot be resolved within this 45 calendar day period, the LEA submits a resolution agreement request using the "Proposed Resolution of Findings" process via CAIS. Authorized LEA staff may request suggestions from CDE staff on the resolution of findings.

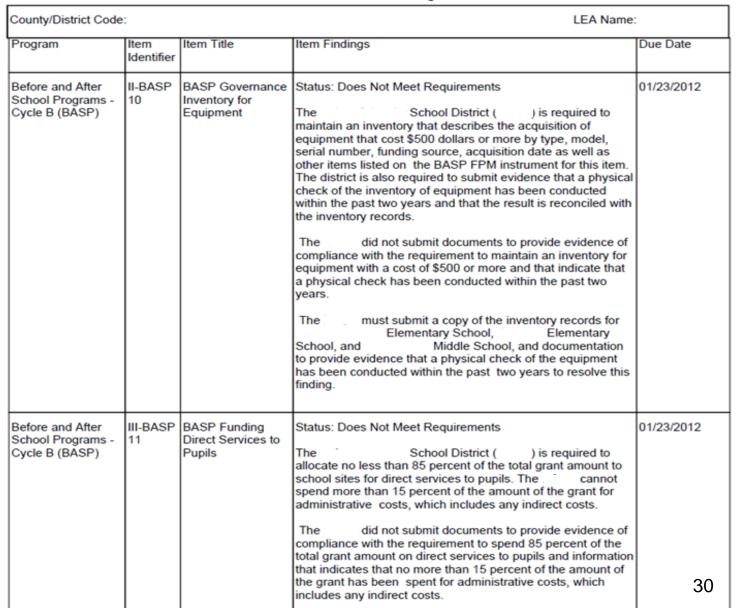
NOTE: Copies of this report were distributed to the LEA. This is a public report and must be made available upon request. (California Public Records Act, Government Code section 6250)

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County/District Code:

California Department of Education

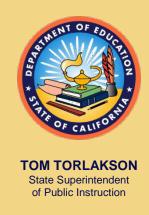
#### Federal Program Monitoring Notification of Findings





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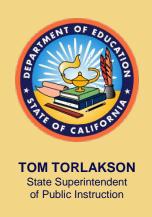
# **Examples of Recent Findings**

- Personnel Activity Reports (PARS) reflect budgeted instead of actual hours
- Time records do not show activities funded through categorical funds
- Job descriptions do not provide sufficient evidence that staff funded with categorical funds provide services to targeted students consistent with the statutory requirements



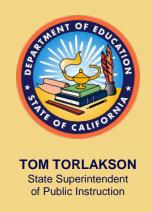
# Importance of Duty Statements

- Duty Statements vs. Job Descriptions
  - Job descriptions are general
  - Duty statements apply to a specific position and are used to document:
    - o Time and effort
    - Primary duties
  - Duty statements allow LEA to show alignment of duties to funding source(s) and assign percentages.

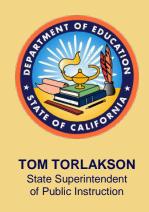


# **Examples of Recent Findings (Cont.)**

- Food purchases and other items not "reasonable and necessary"
- Single Plan for Student Achievement does not reflect final allocations to sites
- Required school-wide plan elements not addressed (See Schoolwide Program Web page at <a href="http://www.cde.ca.gov/sp/sw/rt/">http://www.cde.ca.gov/sp/sw/rt/</a>)

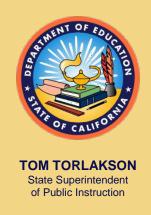


# Organizing for a Successful FPM Review



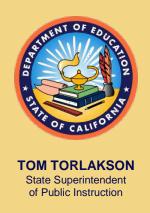
### Preparing for the Review

- Seek district commitment to the review timelines and workload
- Familiarize yourself with program instruments



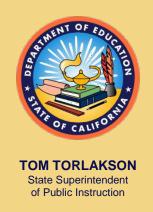
# Preparing for the Review (Cont.)

- Review existing district systems, policies and procedures
- Involve multiple stakeholders early including fiscal staff
- Train staff on program instruments



## Preparing for the Review (Cont.)

- Do not assign yourself as the only submitter for all instruments
- Identify and assign key individuals to assist you on each program instrument (district/site/both)
- Focus early on documents that require more time to modify



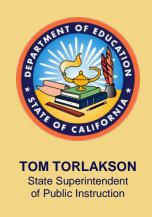
## Preparing for the Review (Cont.)

 Seek communication opportunities with FPM team members to provide you with additional clarification, when needed



#### Uploading and Document Review Period

 Upload early, if possible, but by all means meet the 30 day upload deadline to give reviewers enough time to look thoughtfully at your documentation



### Uploading and Document Review Period

- Post comments in CAIS if you do not receive timely comments
- If needed, request specific feedback from reviewers
- Ask reviewers to identify the gaps in your documentation



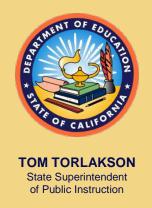
#### **During the Review**

- Have fiscal staff on call
- Schedule School Site Council and key advisory committee meetings during review dates
- Attend all debriefing sessions and take detailed notes
- LEA Review Coordinator must closely monitor all exchanges in CAIS for each instrument



## During the Review (Cont.)

- Anticipate that you and your staff may be required to upload documents throughout the day
- Block out your schedule for the review dates along with that of other key district and site staff



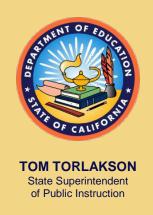
#### Resolving a Finding

- Review the wording of the finding to determine evidence required to resolve item
- Upload evidence to the item
- Change item status to "Resubmitted for Review"
- Post comment in CAIS notifying reviewer of new documentation



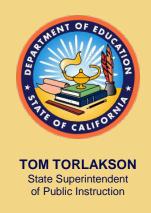
# Resolving a Finding (Cont.)

- Respond as necessary to reviewer comments
- LEA is required to resolve each finding within 45 calendar days following the review
- If the LEA cannot resolve a finding within this time frame, the LEA may request a Resolution Agreement



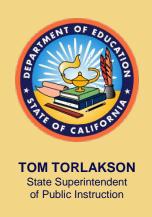
#### Requesting a Resolution Agreement

- Posted in CAIS at the item level
- Change status of item to "Resolution Agreement Requested"
- Agreement cannot extend beyond 225 calendar days after the end of the review



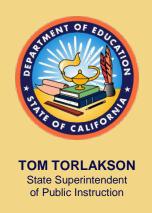
## Requesting a Resolution Agreement (Cont.)

- Indicate steps to be taken and proposed resolution due date
- The CDE program reviewer will grant or deny the request
- Reviewer determines the length of time and enters date in CAIS



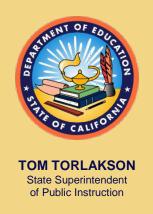
# Organizing Your FPM Review: Tips from the Field

LEA Presentation

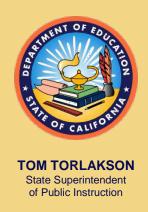


## Maintaining Compliant Programs

- FPM should not be an event: it is an on-going process
- Implement systems that will allow you to maintain the required evidence
- Systems become a form of ongoing professional development and assure continuity



# Most Frequent Findings from 2013–14 Review Cycle



#### Questions



### Additional Resources and Contact Information

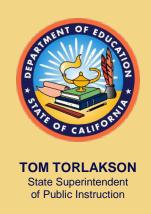
#### CDE

- Program reviewers
- Regional Team Leader

#### County Offices of Education

 CAIS County Lead (See CAIS County Lead Web page

http://www.cde.ca.gov/ta/cr/contact.asp)



## Additional Resources and Contact Information (Cont.)

Federal Program Monitoring Office California Department of Education 916-319-0935

fpmoffice@cde.ca.gov

http://www.cde.ca.gov/ta/cr/